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BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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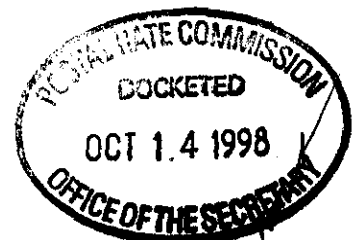
REVISIONS TO LIBRARY REFERENCE RULE

Docket No. RM98-2

COMMENTS OF THE MCGRAW-HILL COMPANIES, INC.

The McGraw-Hill Companies, Inc. ("McGraw-Hill"), by its attorneys, submits these comments in response to the Commission's Notice and Order on Proposed Revisions to Commission Rules on Library References (Order No. 1219, issued August 27, 1998) (63 Fed. Reg. 47456-58). McGraw-Hill strongly supports the thrust of the Commission's proposed revisions to § 31(b) of the rules of practice. We believe that adherence to the rule as so revised would largely avoid the type of serious problems which arose in this regard in Docket No. R97-1. We suggest only relatively minor refinements to the proposed revisions.

First, McGraw-Hill suggests that the following underscored language be added to the final sentence of the second paragraph of § 31(b)(3): "The motion shall also identify authors or others materially contributing to the preparation of the library reference, or explain why such information is not available." In recent rate cases, McGraw-Hill has had occasion to file library references only to provide computer-generated data in response to the interrogatories of other parties, and without offering such data into evidence. We believe that the proposed additional language would be appropriate to address that type of circumstance.

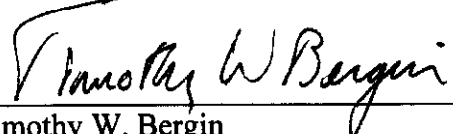


Second, McGraw-Hill suggests that the following underscored language be added to § 31(b)(4): “Material accompanying a motion invoking the library reference designation shall be accepted in the Commission’s docket section conditionally, pending a ruling on the merits of the motion, and shall be served promptly on any and all participants who thereafter so request.” A requirement that particular library references be served on interested parties that request them, as originally proposed by the Alliance of Nonprofit Mailers (see 63 Fed. Reg. at 47456), would materially assist intervenors in coming to grips with Postal Service testimony that relies heavily on library references, as in Docket No. R97-1. See PRC Order No. 1201 (Nov. 4, 1997) at 11 (misuse of library reference process “may effectively prevent other participants from obtaining timely access to information which might be relevant and material to their concerns”).

Conclusion

McGraw-Hill strongly supports the proposed revisions to § 31(b) of the Commission’s rules of practice, and recommends adoption of the refinements suggested above.

Respectfully submitted,



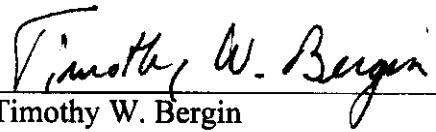
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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document on the United States Postal Service and the Office of the Consumer Advocate.

Washington, D.C.
October 14, 1998



Timothy W. Bergin